

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

| | | |
|------------------------------------------------|---|------------------|
| KEITH COLE, JACKIE BRANNUM, RICHARD | § | |
| KING, MICHAEL DENTON, FRED WALLACE, | § | |
| and MARVIN RAY YATES, individually and on | § | |
| behalf of those similarly situated, | § | CIVIL ACTION NO. |
| | § | 4:14-cv-1698 |
| Plaintiffs, | § | |
| | § | |
| V. | § | |
| | § | |
| BRYAN COLLIER, in his official capacity, | § | |
| ROBERTO HERRERA, in his official capacity, and | § | |
| TEXAS DEPARTMENT OF CRIMINAL JUSTICE, | § | |
| | § | |
| Defendants. | § | |

PLAINTIFFS' MOTION FOR CONTEMPT, TO SHOW CAUSE & SANCTIONS

Exhibit 2

Declaration of D. Armstrong

DECLARATION OF DARIUS ANTOINE ARMSTRONG

1. My name is DARIUS ANTOINE ARMSTRONG
2. My date of birth is 8/1/1984
3. My TDCJ number is 1675648
4. I have been an inmate in the Texas Department of Criminal Justice (TDCJ)'s ~~Wallace~~ Pack Unit in Grimes County, Texas since _____.
5. I am assigned to the Stiles Unit at 12-D-C-33-1.
6. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated herein are within my knowledge and are true and correct.

DAA° THE AIR CONDITIONING HAS NOT BEEN WORKING
IN MY HOUSING AREA AT THE STILES UNIT SINCE
AT LEAST MAY 2019.

DAA° I SWEAT EVERY DAY IN MY HOUSING AREA, SOMETIMES
EVEN AT 1 OR 2 AM.

DAA° I AM NOT PERMITTED TO TAKE COLD SHOWERS
AT THE STILES UNIT.

DARIUS ARMSTRONG

DAA ◦ I AM NOT PERMITTED TO GO TO RESPITE AREAS

AND HAVE BEEN TOLD NO WHEN I ASKED AT STILES.

DAA ◦ I HAVE HIGH BLOOD PRESSURE AND AM PRESCRIBED
MEDICATION FOR IT.

DAA ◦ I HAVE TOLD TDCJ STAFF AT STILES THAT

THE AIR CONDITIONING IS NOT WORKING AND

THAT I AM A MEMBER OF THE PACK UNIT CLASS

ACTION LAWSUIT.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signature: Darius A. Armstrong Dated: 7-18-19

Printed Name: DARIUS ANTOINE ARMSTRONG